

DOCKET FILE COPY ORIGINAL



February 29, 2008

Received & Inspected

MAR 4 - 2008

VIA OVERNIGHT MAIL

FCC Mail Room

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**

In accordance with 47 C.F.R. 64.2009(e) EB Docket No. 06-36, I have enclosed the Annual CPNI Compliance Certification on behalf of Cequel Communications, LLC dba Suddenlink Communications. Please do not hesitate to contact me if you have any questions regarding the enclosed certification.

Sincerely,

A handwritten signature in black ink, appearing to read "Laszlo Lerant", is written over a horizontal line.

Laszlo Lerant  
Paralegal

cc: FCC Enforcement Bureau – Telecommunications Consumers Division (2 Copies)  
Best Copy and Printing Inc.(1 Copy)

No. of Copies rec'd 041  
List ABCDE

**ANNUAL 47 CFR 64.2009(E) CPNI CERTIFICATION,**  
EB DOCKET 06-36

Received & Inspected

MAR 4 - 2008

FCC Mail Room

Annual 64.2009(e) CPNI Certification for year **2007**

**Date Filed:** February 29, 2008

**Name of Company:** Cequel Communications, LLC d/b/a Suddenlink Communications

**Suddenlink Operating Entities/499 ID if applicable**

Cebridge Telecom CA, LLC	825751	Cebridge Telecom LA, LLC	825750
Cebridge Telecom MO, LLC	825752	Cebridge Telecom OK, LLC	825753
Cebridge Telecom WV, LLC	825824	Cebridge Telecom NC, LLC	825911
Cebridge Telecom TX, LP	818512	TCA Communications, LLC	801646
Cebridge Telecom CA, LLC	825751	Friendship Cable of Arkansas	826100

Ceque III Communications II, LLC 826101

Cebridge Acquisition LP (owner of Cable systems)

Cebridge Acquisition LLC (owner of Cable systems)

**Name of signatory:** Timothy A. Thompson

**Title of signatory:** Vice President Telephony

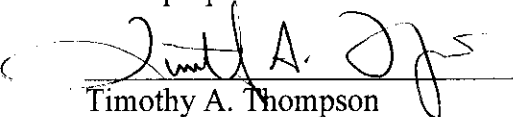
**Name of Contact:** Dennis D. Moffit, Senior Counsel (314) 315-9358

1. I, Timothy A. Thompson, am the Vice President Telephony of Cequel Communications, LLC d/b/a Suddenlink Communications ("Suddenlink") and hereby certify that I have personal knowledge that Suddenlink's affiliate entities offering facilities based Voice over Internet Protocol ("VoIP") phone service ("Suddenlink Operating Entities") have established operating policy and procedures that are adequate to ensure compliance with the Commission's rules governing use and disclosure of customer proprietary network information ("CPNI"), as governed by 47 C.F.R. 64.2001, *et. seq.* of the Federal Communication Commission's ("FCC") CPNI rules. Attached to this certificate is a statement explaining the operating procedures adopted by the Suddenlink Operating Entities to ensure that such entities are in compliance with the said rules.

2. Neither Suddenlink nor the Suddenlink Operating Entities have taken any regulatory or legal actions against data brokers in the last year. Neither Suddenlink nor the Suddenlink Operating entities have any knowledge that pretexters have or attempted to access CPNI in the last year.

3. Cebridge Acquisition LLC is investigating one incident where a cable customer alleged that his personal information (an unlisted cell phone number associated with his cable account) was improperly accessed and obtained by an employee. That matter is also being investigated by the West Virginia Public Service Commission. Other than the incident described above, neither Suddenlink nor the Suddenlink Operating Entities are aware of any complaints or incidents of unauthorized or improper disclosure of CPNI.

Date: 2/29/08

  
Timothy A. Thompson  
Vice President, Telephony  
12444 Powerscourt  
Suite 140  
St. Louis, MO 63131

**STATEMENT CONCERNING PROCEDURES ENSURING COMPLIANCE**  
**WITH CPNI REGULATIONS & REPORT ON UNAUTHORIZED DISCLOSURE**  
**OF CPNI/PRETEXTING**

The internal operating procedures and policies of Suddenlink's Operating Entities, as defined above, ensure that the Operating Entities comply with the FCC's rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use and disclosure of CPNI. Compliance with such rules is demonstrated by the policies, practices, training and audit procedures employed by the Suddenlink Operating Entities. Following is a brief explanation of the procedures that the Suddenlink Operating Entities employ to protect the CPNI of its voice customers.

**First**, as to the use of CPNI for marketing purposes, Suddenlink Operating Entities do not use CPNI for the purpose of marketing service offerings among the different categories of service that the Suddenlink Operating Entities provide to subscribers. The Suddenlink Operating Entities do, however, use CPNI to market service offerings among the same category of service to which the customer already subscribes.

**Second**, the Suddenlink Operating Entities will only release or disclose CPNI to a third party with the customer's written consent or pursuant to a valid request from law enforcement, the federal judiciary or other appropriate authority. For example, without the customer's written consent, customer information will only be disclosed after the requesting party demonstrates that the request is made pursuant to a valid subpoena, court order, search warrant or other legally authorized request.

**Third**, the Suddenlink Operating Entities will only release CPNI to its third party vendors pursuant to a written agreement containing the appropriate restrictions regarding

the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered by the Suddenlink Operating Entities to its subscribers.

**Fourth**, the agents of the Suddenlink Operating Entities do not normally discuss call detail information with an in-bound calling customer. Under certain circumstances the agent may discuss call detail information over the phone with the customer, provided; (1) the customer is able to provide all call detail information to the agent without the agent's assistance; (2) the customer provides a Personal Identification Number ("PIN"), password or security question answer, none of which was established using account information or readily available biographical information ("CPNI Validation"); or (3) the agent calls the customer at the telephone number of record. If a customer requests call detail records, the customer is encouraged to obtain call detail records online or the information will be mailed to the customer at the address of record.

**Fifth**, Suddenlink Operating Entities do not provide online access to any call detail information without CPNI Validation. It is further the policy of the Suddenlink Operating Entities to deny online access to other CPNI without CPNI Validation.

**Sixth**, an address of record will not be changed without CPNI Validation. Upon a change to the customer's address of record, a notice is sent to the customer's previous address of record requesting that the customer contact customer service in the event that a change was not authorized. It is further the policy of the Suddenlink Operating Entities that when a password or system security question is changed by a customer service representative, a letter is sent to the address of record requesting that the customer contact customer service in the event that a change was not authorized. It is further the policy of the Suddenlink Operating Entities that, in the case of a change to the customer's

established online account, notice is sent to the e-mail address established by the customer at the time the customer's service was initiated notifying the customer that a change has been made to their online account and to contact customer service if such change was not authorized.

**Seventh**, Suddenlink Operating Entities do not disclose CPNI to a customer at a retail location without CPNI Validation unless the customer presents a valid government issued photo ID matching the customer's account information.

**Eighth**, the Suddenlink Operating Entities employ a variety of internal and external oversight and operating procedures to ensure compliance with CPNI regulations. Such procedures include:

A) The publication and circulation of CPNI-specific privacy policy training materials within the Suddenlink Operating Entities.

B) Recurring training programs for all agents and employees having access to CPNI concerning legal requirements governing the use and disclosure of personally identifiable information, including CPNI.

C) The implementation and administration of an employee disciplinary program used to ensure compliance with internal procedures. Such program includes a variety of different penalties for the violation of internal privacy procedures, including the termination of employment where appropriate.

D) Physical and software based security systems limiting employee access to CPNI.

E) The maintenance of records of those occasions when CPNI is released to third parties (such release occurring only pursuant to valid request from law enforcement, the federal judiciary or other appropriate authority). Such records are

retained for at least two years.